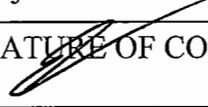
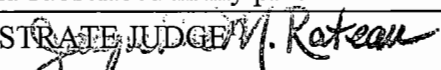


CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America v. Anthony Oliver Pierre DOB: 1984; United States	DOCKET NO. 19-07488MJ MAGISTRATE'S CASE NO.
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:	
<p>On or about July 21, 2019, at or near Benson, in the District of Arizona, Anthony Oliver Pierre, knowing and in reckless disregard of the fact that a certain illegal alien, namely Eduardo Vallejo-Cruz had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain, and placing in jeopardy the life of any person; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii).</p>	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:	
<p>On or about July 21, 2019, at or near Benson, in the District of Arizona, United States Border Patrol Agents (BPA) observed a white Nissan Maxima, Arizona plate CNF7439, traveling on State Route 80 (SR-80) at Mile Post 292. BPA noticed that the vehicle's rear trunk area was weighed down. BPA followed the vehicle and requested a vehicle registration and records check. BPA received notification the vehicle owner had an alert from 2018 for alien smuggling. BPA continued following the vehicle, and the driver made an abrupt turn into the Safeway parking lot. Once in the parking lot, the driver quickly parked his vehicle and ran inside the Safeway grocery store. BPA waited about five minutes and the driver walked out from the store with nothing in hand. The driver, later identified as Anthony Oliver Pierre, approached BPA's vehicle, and Pierre asked was everything ok. Pierre started walking away from the parking lot and away from his vehicle. BPA followed and approached Pierre. Pierre started running towards his vehicle. Pierre got into his vehicle and took off at a high rate of speed. BPA activated his lights and siren and followed the vehicle. While in pursuit, BPA observed Pierre stop the vehicle and attemptd to open the trunk unsuccessfully, on two occasions. Pierre finally stopped his vehicle due to a flat tire and got out and attempted to open the trunk with no success. BPA apprehended Pierre and performed a canine sniff of the vehicle. BPA located two passengers in the trunk, including Eduardo Vallejo-Cruz and an unaccompanied juvenile, citizens of Mexico and in the United States illegally.</p> <p>Material witness Eduardo Vallejo-Cruz stated he made arrangements to be smuggled into the United States for money. Vallejo-Cruz stated he crossed the International Border with five others. After walking for about eight hours, they were taken to an apartment building and told they would have to wait until the checkpoint closed and someone was going to pick him and his cousin up. Vallejo-Cruz stated they were picked up in a white Nissan by a male who spoke English. The witness stated once they were in the vehicle about five minutes, the driver pulled the backseat down and told them to get in the trunk. Vallejo-Cruz stated the trunk was very hot and the car stopped about five minutes later but they were not able to open the trunk.</p>	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: Eduardo Vallejo-Cruz	
Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge AUTHORIZED BY: AUSA RW/kj	SIGNATURE OF COMPLAINANT 
Sworn to before me and subscribed in my presence.	OFFICIAL TITLE Border Patrol Agent
SIGNATURE OF MAGISTRATE JUDGE 	DATE July 22, 2019